

EXHIBIT B

Keith L. Altman

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Specific Expertise - Knowledge Management

Works with attorneys to help them acquire data, turn that data into knowledge, and manage the knowledge. Often the data is in an electronic format which offers many discovery challenges.

Educational Experience

B.S. Program, Astronomy/Physics, 1985-1989, Magna cum Laude, State University of New York at Stony Brook

Computer Experience

Languages: Basic, Fortran, Pascal, Assembly, C, APL, SQL Windows, Visual Basic
Databases: Microsoft Access, SQL

Research Experience

1981-1982, Corroboration with Teacher Herbert Cohen, Farmingdale Public Schools.
Worked on developing models for gaming systems using Fibonacci series. Developed various computer models to analyze gaming systems.

1985-1989, Laboratory of Professor Peter M. Koch, Quantum Electronics Group, Physics Department, State University of New York at Stony Brook.
Work as a paid employee of the Research Foundation of the State University of New York. Was responsible for developing computerized tools to analyze experimental data. Developed applications for instrument control and measurement. Used sophisticated computer modeling to design microwave klystrons for experiments.

1987, Professor Michael Simon, State University of New York at Stony Brook
Developed computer models to analyze infrared imaging data from various telescopic sources.

1988, Professor Gerry Brown, State University of New York at Stony Brook
Developed computer models to analyze theoretical data concerning Supernova 1987A.

1988, Professor Dean Peterson, State University of New York at Stony Brook

Analyzed observational data concerning brightness of stars in the Hyades cluster.
Determined error in observational data helping to redefine the distance to the cluster which is used as a yardstick for many calculations of stellar distances.

Relevant Work Experience

1989-1995, Legal Systems Manager, Beta Business Products
1995-2003, President, The Fibonacci Systems Group; Vice President, The Fibonacci Group
2003-, Managing Director, Complex Litigation Division, Finkelstein & Partners
2003-, Director of Adverse Event Analysis, Finkelstein & Partners

Relevant Litigation Experience

Member of Working Group One (Electronic Discovery) for the Sedona Conference.

18 years experience working in the legal industry.

MindSet

Developed a suite of tools to assist attorneys in managing litigation related data and knowledge.

Breast Implant Litigation

Became involved in the litigation towards the very end (last two years). Some notable tasks.

- Medical Science Literature Database
- Assisted in preparation for trials for Baxter, 3M and Bristol Meyers-Squibb.

FenPhen Litigation (representative tasks similar to other litigation projects)

Serves as the chief plaintiff consultant throughout the United States for litigation in the state courts. Also assisted the MDL in a similar capacity. In this role is responsible for the following.

- Development of discovery demands
Helps draft discovery demands to take records retention issues and electronic information into account. Also helps establish opposing party's information management strategy.
- Collection of production materials
Serves as the repository for all discovery materials.
- Review of production materials
Reviews materials to access completeness and reasonableness in respect to complying with formats described in discovery demands.
- Organization of production materials
Takes the materials and prepares them for use by over 100 law firms.
Converts them to a uniform format and catalogues the materials.
- Distribution of production materials for attorney review
Sends materials out to various attorneys and works with them to provide tools so that materials may be reviewed efficiently.

- **Collection of attorney work product**
Receives materials from attorneys and assembles them into a repository.
- **Management of attorney work product**
Provides expertise in integrating attorney work product with source production materials.
- **Preparation for depositions**
Works with the attorneys to help them integrate production materials into the depositions. Helps prepare exhibit lists.
- **Deposition support**
Attends various depositions as both an expert and for support. Suggested questions during depositions of computer personnel.
- **Trial preparation**
Works with the attorneys to prepare all trial materials for use. Helps develop visual aids and presentation strategy. Coordinates audio-visual needs for the court room.
- **Trial Presentation**
Attends the trial to assist in presentation of exhibits.
- **Medical Science Literature Database**
Developed the strategy for collecting and managing over 4,000 medical articles related to the litigation. Distributed this database to various law firms around the United States.

Major Patent Litigations

Coordinated document productions sent and received for various patent litigations. Helped prepare for trials in many of the same litigations.

Construction Litigation

Worked on trial preparation and presentation of several construction related cases. Most recently, provided trial support for GCNA v. City of Cleveland in federal court in Akron Ohio.

Video Teleconferencing Trial

In Turcinovic v. Floch (New Jersey), provided an affidavit which helped to convince the judge to allow the plaintiff, a quadriplegic residing in Chicago, to testify during his trial by video teleconferencing link. This was the first time in the United States that a plaintiff was allowed to testify in this way. Coordinated all technology at both sites. Although the case settled on the eve of trial, the settlement was accepted by the teleconferencing link with the attorneys conducting an interactive conversation with the plaintiff.

Document Archival Facility Fire

Working for defendant sprinkler manufacturer in a case involving documents destroyed in a fire at a document archive facility. Established an information management infrastructure to coordinate several hundred thousand pages of discovery materials. Providing assistance in assessing compliance with records retention policies on the part of plaintiffs.

Other Litigation Projects

MTBE
Cooper Tire
Lotronex
PPA
Baycol
Accutane
Oxycontin
Vioxx
Celebrex
Lariam
Enbrel
Remicade
Neurontin
Ortho-Evra
SSRI's

Adverse Event Analysis Experience

Developed a collection of tools for the analysis of FDA adverse event data. These analyses are commercially available to the general public.

Provided ADE analysis for 120-Day safety updates of major pharmaceuticals.

Interacts with the FDA on adverse event reporting issues concerning the AERS database.

Developed adverse event section for recently submitted new drug application.

Speaking Experience

Has spoken at several Mealeys conferences as well as numerous bar associations on topics of electronic discovery and litigation technology.

Was on the faculty of the Judicial College for the state of New Jersey in November, 2001.

In June, 2002, spoke at a symposium on electronic discover sponsored by the Federal Bar Association. The proceedings of this symposium are scheduled to be released in book form late 2002.

In July, 2002, spoke on preservation of electronic information at the annual meeting of the Association of Trial Lawyers of America.

In July 2003, spoke on electronic discovery at the annual meeting of the Association of Trial Lawyers of America.

Was on the faculty for the Judicial College for the state of Mississippi in October 2003.

Course advisor and speaker for ATLA seminar on electronic discovery January 2004

In July 2004, spoke on electronic discovery at the annual meeting of the Association of Trial Lawyers of America. CLE credit was awarded for this talk.

In July 2005, spoke on electronic discovery at the annual meeting of the Association of Trial Lawyers of America. CLE credit was awarded for this talk.

In July 2006, spoke on electronic discovery at the annual meeting of the Association of Trials Lawyers of America. CLE credit was awarded for this talk.

In July 2007, spoke on electronic discovery at the annual meeting of the Association of Trials Lawyers of America. CLE credit was awarded for this talk.

In August 2008, Oral Presentation on Methods at the annual meeting of the International Society of Pharmacoepidemiology in Quebec City. Also presented two posters at poster session. Selection for oral presentation and posters was by peer review.

Expert Testimony

South Carolina v Pittman. Admitted as expert on adverse event reporting analysis and adverse event reporting systems. February, 2005

Publishing Experience

Book Chapter on electronic discovery in Electronic Information: Its Life Cycle edited by Alan Blakely published by the Federal Bar Association.

Deciphering the Adverse Event Reporting System. Bert Black and Keith Altman. Trial Magazine, March 2005.

Make the Most of e-Data Experts. Keith Altman. Trial Magazine, October 2005.